

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

TRUE THE VOTE, *et al.*

PLAINTIFFS

V.

CIVIL ACTION NO.: 3:14-CV-532-NFA

THE HONORABLE DELBERT HOSEMANN,  
in his official capacity, as Secretary of State for the  
State of Mississippi, *et al.*,

DEFENDANTS

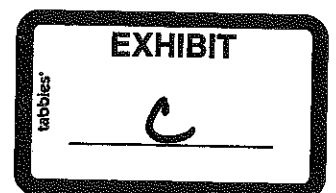
STATE OF MISSISSIPPI

COUNTY OF LAUDERDALE

**AFFIDAVIT OF AWANA SIMMONS**

COMES NOW the undersigned, Awana Simmons, being duly sworn, states on her  
oath as follows:

1. I am over the age of 21 years, have personal knowledge and am competent  
to testify regarding the matters contained herein.
2. I am the duly elected District 3 Election Commissioner for Lauderdale  
County, Mississippi.
3. On the morning of Monday, July 7, 2014, I was in the vault of the  
Lauderdale County Circuit Clerk's office supervising an inspection by representatives  
(Jean Ming and Todd Vallot) of the Chris McDaniel campaign of the contents of the  
ballot boxes as well as the poll books from the June 24, 2014 primary run-off election. A  
representative (Marion Reid) of the Thad Cochran campaign had participated earlier in



the morning, but she had already departed by the time that another couple entered the vault.

4. More specifically, while I was answering questions from the McDaniel campaign representatives, a man and woman walked into the vault. I was unfamiliar with them and asked if I could help them. They responded that they wanted to look at the absentee ballots and absentee envelopes from the June 24, 2014 run-off election. I then asked who they were with and they responded that they were with True The Vote. I asked if they were from this area and they responded that they were from Texas. I then explained that they would have to wait for one of the other Election Commissioners to come and be with them while they examined anything because I was already supervising the election materials inspection by representatives of the Chris McDaniel campaign.

5. The True The Vote representatives then responded that they understood, but asked why the absentee ballot and absentee ballot envelopes were not located together. I provided an explanation to the True The Vote representatives. As I was completing that explanation, Election Commissioner Wallace Heggie entered the vault. He spoke briefly to the True The Vote representatives and then they left the vault together. I returned to assisting the McDaniel campaign representatives, who had stopped their inspection until I finished answering the questions of the True The Vote representatives. I had no further contact with the two representatives from True The Vote.

6. At no time did the two representatives from True The Vote


ask me to review, copy or obtain copies of any poll books.

7. At no time did the two True The Vote representatives submit any written request to me for anything.

8. I am not aware of any oral request or written request by the two True The Vote representatives to review, copy or obtain copies of any poll books from either the June 3, 2014 primary election or the June 24, 2014 primary run-off election.

9. To my knowledge, since July 7, 2014, neither the couple nor any other representative of the True The Vote has returned to either the office of the Lauderdale County Circuit Clerk or the office of the Lauderdale County Election Commission.

10. This concludes my Affidavit.

  
Awana Simmons

SWORN TO AND SUBSCRIBED BEFORE ME, this the 6<sup>th</sup> day of August, 2014.

  
NOTARY PUBLIC

My Commission Expires:  
1-13-2016

